DAYLE ELIESON 1 United States Attorney BRANDON C. JAROČH 2 Assistant United States Attorney 501 Las Vegas Boulevard South, Suite 1100 Las Vegas, Nevada 89101 3 (702) 388-6336/Fax: (702) 388-6020 brandon.jaroch@usdoj.gov 4 Attorneys for the United States 5 UNITED STATES DISTRICT COURT 6 DISTRICT OF NEVADA 7 -oOo-8 9

UNITED STATES OF AMERICA,

Plaintiff,

vs.

Case No.: 2:18-cr-00060-RFB-VCF

STIPULATION TO CONTINUE

DISCOVERY AND MOTION

DEADLINES

ROBERT HUGHES,

(First Request)

12 ROBERT HUGHES,

13 Defendant.

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IT IS HEREBY STIPULATED AND AGREED, by and between Dayle Elieson, United States Attorney, and Brandon C. Jaroch, Assistant United States Attorney, counsel for the United Stated of America, and Christopher R. Oram, Esq., counsel for Robert Hughes that the Government's Discovery due April 10, 2018, any Pretrial Motions due April 20, 2018, and any Responses due April 27, 2018, be vacated and continued for one week, respectively.

This stipulation is entered into for the following reasons:

1. Due to unforeseen delays in the Government counsel's office move and the case agent's current unavailability, the Government requires additional time to complete the

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collection and discovery of materials. The Government anticipates this short delay would allow for all evidence to be properly provided to the defense.

- 2. Defense counsel and Government counsel agree to the stipulation.
- 3. Defendant is incarcerated and does not object to a continuance.
- 4. Additionally, denial of this request for continuance could result in a miscarriage of justice.
- 5. The parties do not anticipate this delay will impact the current trial setting with the understanding that any pretrial motions filed will toll the Speedy Trial Clock and likely require a continuance of the trial.
  - 6. This is the first request to continue the pretrial deadlines.

DATED this 10th day April, 2018.

/s/ Brandon C. Jaroch
By\_\_\_\_\_
BRANDON C. JAROCH
Assistant United States Attorney

/s/ Christopher R. Oram
By\_\_\_\_
CHRISTOPHER R. ORAM, Esq.
Counsel for HUGHES

## UNITED STATES DISTRICT COURT DISTRICT OF NEVADA

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UNITED STATES OF AMERICA,	) Case No.:: 2:18-cr-00060-RFB-VCF
Plaintiff,	ORDER
vs.	
ROBERT HUGHES,	
Defendant.	

## FINDINGS OF FACT

Based on the pending Stipulation of counsel, and good cause appearing therefore, the Court finds that:

- 1. Counsel for the Government requires additional time to complete the discovery process.
  - 2. Defense counsel and Government counsel agree to the stipulation.
  - 3. Defendant is incarcerated and agrees to the continuance.
- 4. The denial of this request for continuance could result in a miscarriage of justice.
  - 5. This is the first request to continue the pretrial deadlines.

For all of the above-stated reasons, the ends of justice would best be served by a continuance of the deadlines as requested.

## **CONCLUSIONS OF LAW**

The ends of justice would be served by granting said stipulation since failure to grant would likely result in a miscarriage of justice and would deny the parties herein sufficient time and opportunity to effectively and thoroughly prepare for trial in the exercise of due diligence.

## **ORDER**

IT IS ORDERED that the Government's deadline to disclose all of the discovery it is required to provide under Rule 16 of the Federal Rules of Criminal Procedure is continued until April 17, 2018.

IT IS FURTHER ORDERED that the Pretrial Motions deadline is continued to April 27, 2018 with any Responses due May 4, 2018.

DATED this 11th day of April, 2018.

RICHARD F. BOULWARE, II UNITED STATES DISTRICT JUDGE